

I believe that most of the provisions of this Part 97 Rulemaking have been well-thought out.

I am opposed, though, to transferring the segment of the 40 meter band from 7125-7150 khz to radiotelephone use.

I operate actively in this segment, and there is an extensive amount of radiotelegraph activity in it. This portion of the 40 meter band is used by all classes of licensees who are beginners at using the radiotelegraph code. In this segment, they gather to try to meet other beginning telegraphers, or more experienced telegraphers who would like to help them develop their telegraphy skills. This is a very worthwhile use for this portion of the 40 meter band. There will be significant impact on incumbent users of this segment if it is transferred to radiotelephone use.

The change in the 80 meter allocation; allowing radiotelephone use between 3725-3750 khz, could be accommodated without significantly affecting incumbent users.

Thank you for the opportunity to comment.

Respectfully Submitted,

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